

North American Die Casting Association

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Mr. Jere W. Glover Chief Counsel for Advocacy U.S. Small Business Administration 409 Third Street, SW Washington DC 20516

Dear Mr. Glover:

On behalf of the North American Die Casting Association (NADCA), we would like to take this opportunity to recognize the Small Business Administration's (SBA) Office of Advocacy and your efforts to serve, promote and assist small business. The SBA Office of Advocacy has proven itself to be a dependable source for information and intervention in key agency rulemakings.

NADCA is the sole trade and technical association of the die casting industry. Most die casters are small business operations - 92% of our die casting operations fall under that definition, with 60% employing less than 100 people. Die casters manufacture a large and diverse array of castings that are critical to the success and operation of every major manufacturing sector in the nation from agricultural and mining, energy, and transportation, to aerospace, electronics, and national defense.

For NADCA, the Office of Advocacy was instrumental in turning the tide in the U.S. Environmental Protection Agency's (EPA) efforts to regulate aluminum die casters under air standards being developed for another industry. During the Secondary Aluminum MACT debate, the Office of Advocacy stepped in at the request of the die casting industry and framed the issues of concern relating to EPA's adherence to SBREFA. In the end, SBA negotiated a precedent-setting agreement that will ensure EPA analyzes the die casting industry independently and considers the small business impacts of its actions before imposing new air regulations.

We applaud the Office of Advocacy for the attention and advocacy being paid to small business across the country. Without Mr. Glover and his staff, small business and specifically the die casting industry would be unable to fully participate in the regulatory process.

Sincerely.

Daniel L. Twarog

President